

EAG:NS
F. #2020R00275

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

Filed October 08, 2020

1:20-cr-00427

Judge Roslynn R. Mauskopf

UNITED STATES OF AMERICA

- against -

DONNELL RUSSELL,
also known as "Don Russell"
and "Colon Dunn,"

Defendant.

----- X

THE GRAND JURY CHARGES:

INTERSTATE STALKING

On or about and between November 2018 and February 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DONNELL RUSSELL, also known as "Don Russell" and "Colon Dunn," together with others, did knowingly and intentionally use (i) the mail, (ii) an interactive computer service, electronic communication service and electronic communication system of interstate commerce, and (iii) a facility of interstate commerce to engage in a course of conduct that caused, attempted to cause and would reasonably be expected to cause substantial emotional distress to Jane Doe, an individual whose identity is known to the Grand Jury, and an


I N D I C T M E N T

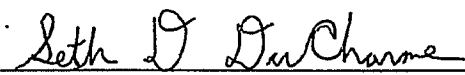
Cr. No. **1:20-cr-00427**
(T. 18, U.S.C., §§ 2261A(2)(B),
2261(b)(5), 2 and 3551 et seq.)

immediate family member of Jane Doe, with the intent to harass and intimidate Jane Doe and the immediate family member of Jane Doe.

(Title 18, United States Code, Sections 2261A(2)(B), 2261(b)(5), 2 and 3551
et seq.)

A TRUE BILL


FOREPERSON


SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

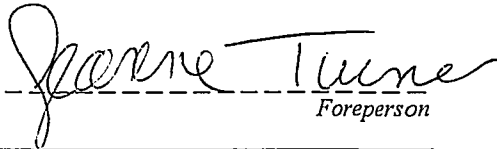
DONNELL RUSSELL,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2261A(2)(B), 2261(b)(5), 2 and 3551 et seq.)

A true bill.


Foreperson

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

*Elizabeth Geddes, Nadia Shihata & Maria Cruz Melendez, Assistant U.S. Attorneys
(718) 254-7000*